

Application No.: 10/699,311
Reply to Office Action mailed on 6/11/2008
Reply dated 9/11/2008

REMARKS

In response to the above-identified Office Action, Applicant amends the Application and seeks reconsideration in view of the following remarks. In this Response, Applicant amends claims 1, 7, 14, and 19. Applicant does not cancel or add any new claims. Accordingly, claims 1-28 remain pending in the Application.

I. Claims Rejected Under 35 U.S.C. § 103

A. Reitmeier in view of Coufal

Claims 1, 4, 7-8, 19, and 26 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,118,498 issued to Reitmeier (“*Reitmeier*”) in view of U.S. Patent Application Publication No. 2003/0163829 filed by Coufal et al. (“*Coufal*”). Applicant respectfully traverses the rejection, at least in view of the amendments to independent claims 1, 7, and 19.

To render a claim obvious, the cited references must disclose each and every element of the rejected claim (*see MPEP § 2143*). Among other elements, amended claim 1 defines an apparatus for display of video data from a plurality of video sources comprising “a plurality of video channels configured to be coupled to different video sources” and “a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels” (*emphasis added*). Applicant submits that the combination of *Reitmeier* and *Coufal* fails to disclose at least these elements of claim 1.

In making the rejection, the Patent Office admits that *Reitmeier* “does not specifically disclose a plurality of video sources, or video decoders coupled to different video sources” (Paper No./Mail Date 20080603, page 3). Moreover, in reviewing *Reitmeier* Applicant is unable to discern any sections of *Reitmeier* disclosing such elements. In fact, in response to the Patent Office’s allegation that the demodulators (reference numerals 15A and 15B) in FIG. 1 of *Reitmeier* are equivalent to Applicant’s decoders defined in claim 1 (*see Id.*), Applicant submits that one skilled in the art knows that a demodulator and a decoder are different devices and are not interchangeable. In fact, *Reitmeier* discloses a single decoder (reference numeral 45) in FIG. 1, showing that *Reitmeier*

understood the difference between demodulators 15A, 15B and decoder 45. As such, one skilled in the art knows that demodulators 15A, 15B are not the same as a decoder, and accordingly, modulators 15A, 15B cannot be replaced by a decoder in *Reitmeier*'s device. Therefore, *Reitmeier* fails to disclose at least "a plurality of video channels configured to be coupled to different video sources" and "a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels," as recited in claim 1. The Patent Office relies on the disclosure in *Coufal* to cure the defects of *Reitmeier*; however, Applicant submits that *Coufal* fails to cure such defects.

The Patent Office characterizes *Coufal* as disclosing "a plurality of video sources (video sources 10-1 – 10-N, see Fig. 3), and video decoders (decoders 1a-Nb, see Fig. 3) coupled to different video sources (see Fig. 3)" (Paper No./Mail Date 20080603, page 3, parentheticals in original). Applicant respectfully submits that the disclosure in *Coufal* fails to disclose the elements of "a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels" as recited in claim 1, and that *Coufal* is not combinable with *Reitmeier*.

In FIG. 3, *Coufal* shows six decoders (reference numeral 1a-Nb) connected to channels 1 and 2. Specifically, decoders 1a, 2a, and Na are each coupled to channel 1, and decoders 1b, 2b, and Nb are each coupled to channel 2. As such, Applicant submits that *Coufal* discloses a plurality of channels that are each connected to a plurality of decoders. Therefore, *Coufal* fails to disclose at least the elements of "a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels," as recited in claim 1 (emphasis added).

Furthermore, as discussed above a demodulator is different from a decoder. That is, the functionality of a demodulator is not the same as a decoder. As such, in accordance with MPEP § 2143 the demodulators in *Reitmeier*'s device cannot be replaced by the decoders disclosed in *Coufal*'s device because replacing such demodulators with such decoders would change the

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principle of operation of *Reitmeier*'s device. Therefore, *Reitmeier* and *Coufal* cannot be properly combined under MPEP § 2143 to reject claim 1 under 35 U.S.C. § 103.

At least for the reasons discussed above, the combination of *Reitmeier* and *Coufal* fails to teach or suggest each and every element of claim 1. Therefore, claim 1 is not obvious over *Reitmeier* in view of *Coufal*. Accordingly, Applicant respectfully requests withdrawal of the rejection of independent claim 1.

Claim 4 depends from claim 1 and includes all of the elements thereof. Therefore, Applicant submits that claim 4 is not obvious over the combination of *Reitmeier* and *Coufal* at least for the same reasons as claim 1, in addition to its own unique features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 4.

Referring to the rejection of claim 7, claim 7 defines a method comprising "receiving video data from each of the plurality of video sources via a plurality of video channels" and "decoding, with a plurality of video decoders, at least a portion of the video data received from the plurality of video channels, each video decoder receiving video data via a different video channel" similar to the elements of "a plurality of video channels configured to be coupled to different video sources" and "a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels," as recited in claim 1. Therefore, Applicant submits that the discussion above regarding the combination of *Reitmeier* and *Coufal* failing to teach or suggest each and every claim 1, and that the combination of *Reitmeier* and *Coufal* are not combinable under MPEP § 2143 is equally applicable to similar elements recited in claim 7. Therefore, Applicant submits that claim 7 is not obvious over the combination of *Reitmeier* and *Coufal* at least for the same reasons as claim 1, in addition to its own unique features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 7.

Claim 8 depends from claim 7 and includes all of the elements thereof. Therefore, Applicant submits that claim 8 is not obvious over the combination of *Reitmeier* and *Coufal* at least for the same reasons as claim 7, in addition to its own unique features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 8.

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Referring to the rejection of claim 19, claim 19 defines a system comprising “a plurality of video channels coupled to the plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data to a different one of the plurality of video channels” and “a video logic coupled to the plurality of video channels, the video logic comprising a plurality of video decoders, wherein each of the plurality of video decoders is configured to receive the video data from a different one of the plurality of video sources and to decode the video data” similar to the elements of “a plurality of video channels configured to be coupled to different video sources” and “a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels,” as recited in claim 1. Therefore, Applicant submits that the discussion above regarding the combination of *Reitmeier* and *Coufal* failing to teach or suggest each and every claim 1, and that the combination of *Reitmeier* and *Coufal* are not combinable under MPEP § 2143 is equally applicable to similar elements recited in claim 19. Therefore, Applicant submits that claim 19 is not obvious over the combination of *Reitmeier* and *Coufal* at least for the same reasons as claim 1, in addition to its own unique features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 19.

Claim 26 depends from claim 19 and includes all of the elements thereof. Therefore, Applicant submits that claim 26 is not obvious over the combination of *Reitmeier* and *Coufal* at least for the same reasons as claim 19, in addition to its own unique features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 26.

B. *Reitmeier* in view of *Coufal*, *Machida*, and *Itoh*

Claims 2-3 and 20-21 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Coufal*, European Patent No. EP 1,158,788 issued to Machida et al. (“*Machida*”), and U.S. Patent No. 6,487,719 issued to Itoh (“*Itoh*”). Applicant respectfully traverses the rejection.

Claims 2-3 depend from independent claim 1 and claims 20-21 depend from independent claim 19, and include all of the elements of their respective independent claims. In rejecting claims

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2-3 and 20-21, the Patent Office characterizes *Reitmeier* and *Coufal* similar to the rejection of claims 1 and 19 discussed above. Applicant has discussed the failure of the combination of *Reitmeier* and *Coufal* to teach or suggest each and every element of claims 1 and 19, and that *Reitmeier* and *Coufal* are not combinable under MPEP § 2143, and respectfully submits that such discussion is equally applicable to claims 2-3 and 20-21 because of their respective dependencies from claims 1 and 19. The Patent Office relies on the disclosures in *Machida* and *Itoh* to cure the defects of *Reitmeier* and *Coufal*; however, Applicant submits that *Machida* and *Itoh* individually and in combination fail to cure such defects.

In making the rejection, the Patent Office does not cite *Machida* nor *Itoh* as disclosing “a plurality of video channels configured to be coupled to different video sources” and “a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels,” as recited in claim 1 and similarly recited in claim 19. Moreover, in reviewing *Machida* and *Itoh* Applicant is unable to discern any sections in either *Machida* or *Itoh* disclosing such elements. Therefore, *Machida* and *Itoh* fail to cure the defects of *Reitmeier* and *Coufal*.

The failure of the combination of *Reitmeier*, *Coufal*, *Machida*, and *Itoh* to disclose each and every element of claims 2-3 and 20-21 is fatal to the obviousness rejection. Therefore, claims 2-3 and 20-21 are not obvious over *Reitmeier* in view of *Coufal*, *Machida*, and *Itoh*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 2-3 and 20-21.

C. *Reitmeier* in view of *Coufal* and *Machida*

Claims 5 and 22 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Coufal*, and *Machida*. Applicant respectfully traverses the rejection.

Claim 5 depends from independent claim 1 and claim 22 depends from independent claim 19, and include all of the elements of their respective independent claims. In rejecting claims 5 and 22, the Patent Office characterizes *Reitmeier* and *Coufal* similar to the rejection of claims 1 and 19 discussed above. Applicant has discussed the failure of the combination of *Reitmeier* and *Coufal* to

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teach or suggest each and every element of claims 1 and 19, and that *Reitmeier* and *Coufal* are not combinable under MPEP § 2143, and respectfully submits that such discussion is equally applicable to claims 5 and 22 because of their respective dependencies from claims 1 and 19. The Patent Office relies on the disclosure in *Machida* to cure the defects of *Reitmeier* and *Coufal*; however, Applicant submits that *Machida* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Machida* as disclosing “a plurality of video channels configured to be coupled to different video sources” and “a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels,” as recited in claim 1 and similarly recited in claim 19. Moreover, in reviewing *Machida* Applicant is unable to discern any sections in *Machida* disclosing such elements. Therefore, *Machida* fails to cure the defects of *Reitmeier* and *Coufal*.

The failure of the combination of *Reitmeier*, *Coufal*, and *Machida* to disclose each and every element of claims 5 and 22 is fatal to the obviousness rejection. Therefore, claims 5 and 22 are not obvious over *Reitmeier* in view of *Coufal* and *Machida*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 5 and 22.

D. *Reitmeier* in view of *Coufal* and *Miyazaki*

Claims 6, 9-10, 14, and 27-28 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Coufal* and U.S. Patent No. 5,883,676 issued to Miyazaki et al. (“*Miyazaki*”). Applicant respectfully traverses the rejection.

Claims 6, 9-10, and 27-28 depend from independent claims 1, 7, and 19, respectively, and include all of the elements of their respective independent claims. In rejecting claims 6, 9-10, and 27-28 the Patent Office characterizes *Reitmeier* and *Coufal* similar to the rejection of claims 1, 7, and 19 discussed above. Applicant has discussed the failure of the combination of *Reitmeier* and *Coufal* to teach or suggest each and every element of claims 1, 7, and 19, and that *Reitmeier* and *Coufal* are not combinable under MPEP § 2143, and respectfully submits that such discussion is equally applicable to claims 6, 9-10, and 27-28 because of their respective dependencies from claims

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1, 7, and 19. The Patent Office relies on the disclosure in *Miyazaki* to cure the defects of *Reitmeier* and *Coufal*; however, Applicant submits that *Miyazaki* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Miyazaki* as disclosing “a plurality of video channels configured to be coupled to different video sources” and “a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels,” as recited in claim 1 and similarly recited in claims 7 and 19. Moreover, in reviewing *Miyazaki* Applicant is unable to discern any sections in *Miyazaki* disclosing such elements. Therefore, *Miyazaki* fails to cure the defects of *Reitmeier* and *Coufal*.

The failure of the combination of *Reitmeier*, *Coufal*, and *Miyazaki* to disclose each and every element of claims 6, 9-10, and 27-28 is fatal to the obviousness rejection. Therefore, claims 6, 9-10, and 27-28 are not obvious over *Reitmeier* in view of *Coufal* and *Miyazaki*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 6, 9-10, and 27-28.

Referring to the rejection of claim 14, claim 14 defines a method comprising “receiving first video data from a first video source at a first video decoder via a first video channel” and “receiving second video data from a second video source at a second video decoder via a second video channel” similar to the elements of “a plurality of video channels configured to be coupled to different video sources” and “a plurality of video decoders coupled to the plurality of video channels, each video decoder coupled to a different one of the plurality of video channels,” as recited in claim 1. Therefore, Applicant submits that the discussion above regarding the combination of *Reitmeier* and *Coufal* failing to disclose at least the elements of “a plurality of video decoders configured to be coupled to different video sources” recited in claim 1 is equally applicable to similar elements recited claim 14. Therefore, Applicant submits that claim 14 is not obvious over the combination of *Reitmeier* and *Coufal* at least for the same reasons as claim 1, in addition to its own unique features. The Patent Office relies on the disclosure in *Miyazaki* to cure the defects of *Reitmeier* and *Coufal*; however, Applicant submits that *Miyazaki* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Miyazaki* as disclosing “receiving first video data from a first video source at a first video decoder via a first video channel” and

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“receiving second video data from a second video source at a second video decoder via a second video channel” as recited in claim 14. Moreover, in reviewing *Miyazaki* Applicant is unable to discern any sections in *Miyazaki* disclosing such elements. Therefore, *Miyazaki* fails to cure the defects of *Reitmeier* and *Coufal*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 14.

E. *Reitmeier* in view of *Coufal* and *Cooper*

Claims 11-13 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Coufal* and U.S. Patent Application Publication No. 2004/0003399 filed by Cooper (“*Cooper*”). Applicant respectfully traverses the rejection.

Claims 11-13 depend from claim 7 and include all of the elements thereof. In rejecting claims 11-13, the Patent Office characterizes *Reitmeier* and *Coufal* similar to the rejection of claim 7 discussed above. Applicant has discussed the failure of the combination of *Reitmeier* and *Coufal* to teach or suggest each and every element of claim 7, and that *Reitmeier* and *Coufal* are not combinable under MPEP § 2143, and respectfully submits that such discussion is equally applicable to claims 11-13 because of their respective dependencies from claim 7. The Patent Office relies on the disclosure in *Cooper* to cure the defects of *Reitmeier* and *Coufal*; however, Applicant submits that *Cooper* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Cooper* as disclosing “receiving video data from each of the plurality of video sources via a plurality of video channels” and “decoding, with a plurality of video decoders, at least a portion of the video data received from the plurality of video channels, each video decoder receiving video data via a different video channel” as recited in claims 11-13 via claim 7. Moreover, in reviewing *Cooper* Applicant is unable to discern any sections in *Cooper* disclosing such elements. Therefore, *Cooper* fails to cure the defects of *Reitmeier* and *Coufal*.

The failure of the combination of *Reitmeier*, *Coufal*, and *Cooper* to disclose each and every element of claims 11-13 is fatal to the obviousness rejection. Therefore, claims 11-13 are not

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obvious over *Reitmeier* in view of *Coufal*, and *Cooper*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 11-13.

F. Reitmeier in view of Coufal, Miyazaki, and Miura

Claims 15-17 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Coufal*, *Miyazaki*, and U.S. Patent No. 6,456,335 issued to Miura et al. (“*Miura*”). Applicant respectfully traverses the rejection.

Claims 15-17 depend from claim 14 and include all of the elements thereof. In rejecting claims 15-17, the Patent Office characterizes *Reitmeier*, *Coufal*, and *Miyazaki* similar to the rejection of claim 14 discussed above. Applicant has discussed the failure of the combination of *Reitmeier*, *Coufal*, and *Miyazaki* to teach or suggest at least “receiving first video data from a first video source at a first video decoder via a first video channel” and “receiving second video data from a second video source at a second video decoder via a second video channel” as recited in claim 14, and respectfully submits that such discussion is equally applicable to claims 15-17 because of their dependency from claim 14. The Patent Office relies on the disclosure in *Miura* to cure the defects of *Reitmeier*, *Coufal*, and *Miyazaki*; however, Applicant submits that *Miura* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Miura* as disclosing “receiving first video data from a first video source at a first video decoder via a first video channel” and “receiving second video data from a second video source at a second video decoder via a second video channel,” as recited in claims 15-17 via claim 14. Moreover, in reviewing *Miura* Applicant is unable to discern any sections in *Miura* disclosing such elements. Therefore, *Miura* fails to cure the defects of *Reitmeier*, *Coufal*, and *Miyazaki*.

The failure of the combination of *Reitmeier*, *Coufal*, *Miyazaki*, and *Miura* to disclose each and every element of claims 15-17 is fatal to the obviousness rejection. Therefore, claims 15-17 are not obvious over *Reitmeier* in view of *Coufal*, *Miyazaki*, and *Miura*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 15-17.

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G. Reitmeier in view of Coufal, Miyazaki, and Machida

Claim 18 stands rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Coufal*, *Miyazaki*, and *Machida*. Applicant respectfully traverses the rejection.

Claim 18 depends from claim 14 and includes all of the elements thereof. In rejecting claim 14 the Patent Office characterizes *Reitmeier*, *Coufal*, and *Miyazaki* similar to the rejection of claim 14 discussed above. Applicant has discussed the failure of the combination of *Reitmeier*, *Coufal*, and *Miyazaki* to teach or suggest at least “receiving first video data from a first video source at a first video decoder via a first video channel” and “receiving second video data from a second video source at a second video decoder via a second video channel” as recited in claim 14, and respectfully submits that such discussion is equally applicable to claim 18 because of its dependency from claim 14. The Patent Office relies on the disclosure in *Machida* to cure the defects of *Reitmeier*, *Coufal*, and *Miyazaki*; however, Applicant submits that *Machida* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Machida* as disclosing “receiving first video data from a first video source at a first video decoder via a first video channel” and “receiving second video data from a second video source at a second video decoder via a second video channel” as recited in claim 18 via claim 14. Moreover, in reviewing *Machida* Applicant is unable to discern any sections in *Machida* disclosing such elements. Therefore, *Machida* fails to cure the defects of *Reitmeier*, *Coufal*, and *Miyazaki*.

The failure of the combination of *Reitmeier*, *Coufal*, *Miyazaki*, and *Machida* to disclose each and every element of claim 18 is fatal to the obviousness rejection. Therefore, claim 18 is not obvious over *Reitmeier* in view of *Coufal*, *Miyazaki*, and *Machida*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 18.

H. Reitmeier in view of Coufal and Miura

Claims 23-25 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Coufal* and *Miura*. Applicant respectfully traverses the rejection.

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Claims 23-25 depend from claim 19 and include all of the elements thereof. In rejecting claims 23-25 the Patent Office characterizes *Reitmeier* and *Coufal* similar to the rejection of claim 19 discussed above. Applicant has discussed the failure of the combination of *Reitmeier* and *Coufal* to teach or suggest at least “a plurality of video channels coupled to the plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data to a different one of the plurality of video channels” and “a video logic coupled to the plurality of video channels, the video logic comprising a plurality of video decoders, wherein each of the plurality of video decoders is configured to receive the video data from a different one of the plurality of video sources and to decode the video data,” as recited in claim 19 and respectfully submits that such discussion is equally applicable to claims 23-25 because of their dependency from claim 19. The Patent Office relies on the disclosure in *Miura* to cure the defects of *Reitmeier* and *Coufal*; however, Applicant submits that *Miura* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Miura* as disclosing “a plurality of video channels coupled to the plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data to a different one of the plurality of video channels” and “a video logic coupled to the plurality of video channels, the video logic comprising a plurality of video decoders, wherein each of the plurality of video decoders is configured to receive the video data from a different one of the plurality of video sources and to decode the video data,” as recited in claims 23-25 via claim 19. Moreover, in reviewing *Miura* Applicant is unable to discern any sections in *Miura* disclosing such elements. Therefore, *Miura* fails to cure the defects of *Reitmeier* and *Coufal*.

The failure of the combination of *Reitmeier*, *Coufal*, and *Miura* to disclose each and every element of claims 23-25 is fatal to the obviousness rejection. Therefore, claims 23-25 are not obvious over *Reitmeier* in view of *Coufal* and *Miura*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 23-25.

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CONCLUSION

In view of the foregoing, it is believed that all claims now pending are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (480) 385-5060 or jgraff@ifllaw.com.

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 50-2091 for any fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,

Date: September 11, 2008

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